

# EXHIBIT

E

Subject: **Re: Peronace v. City of Philadelphia**  
Date: 11/9/2023 3:47:10 PM Eastern Standard Time  
From: jschm47740@aol.com  
To: Irene.Lu@phila.gov, Derek.Kane@Phila.gov  
Cc: ramirezj@dial-law.com

Dear Ms. Lu:

Attached please correspondence and 30(b)(6) Notices of Deposition for November 28, 2023.

We anticipate locating and scheduling the depositions of the medical staff that were identified in my previous emails.

Please contact me with any questions.

Jeffrey D. Schmidt, Esquire

Rovner, Allen, Rovner, Zimmerman and Schmidt  
175 Bustleton Pike

Feasterville, PA 19053

Phone - (215) 953-2706

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH PERONACE : CIVIL ACTION - LAW  
v. : NO. 23-3943-KSM  
CITY OF PHILADELPHIA :

**NOTICE OF DEPOSITION PURSUANT TO F.R.C.P. 30(b)(6)**

TO: City of Philadelphia Law Department  
c/o Irene Lu, Esquire  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102

**PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil Procedure, Plaintiff, Joseph Peronace, by his attorney, Jeffrey D. Schmidt, will take the deposition of Defendant's Director of CFCF/Warden or Acting Warden, who is responsible for the day-to-day administration of CFCF, oversight and of current policies and procedures, implementation and enforcement of applicable policies and procedures, before a person duly authorized to administer oaths, via Zoom on **Tuesday, November 28, 2023 at 10:00 a.m.** and to continue from day to day until completed. You are requested to appear at the aforesaid time and place.

**ROVNER, ALLEN, ROVNER  
ZIMMERMAN, SIGMAN AND SCHMIDT**

DATED: November 9, 2023 BY: /s/Jeffrey D. Schmidt  
JEFFREY D. SCHMIDT, ESQUIRE  
Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH PERONACE : CIVIL ACTION - LAW  
v. : NO. 23-3943-KSM  
CITY OF PHILADELPHIA :

**NOTICE OF DEPOSITION PURSUANT TO F.R.C.P. 30(b)(6)**

TO: City of Philadelphia Law Department  
c/o Irene Lu, Esquire  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102

**PLEASE TAKE NOTICE** that pursuant to the Federal Rules of Civil Procedure, Plaintiff, Joseph Peronace, by his attorney, Jeffrey D. Schmidt, will take the deposition of Defendant's Director of Medical Services, who is responsible for setting protocols, use of appropriate protocols, monitor care, standards for inmate medical care, oversee medical care, ensure positions filled, quality control for the medical care provided to inmates, before a person duly authorized to administer oaths, via Zoom on **Tuesday, November 28, 2023 at 10:00 a.m.** and to continue from day to day until completed. You are requested to appear at the aforesaid time and place.

**ROVNER, ALLEN, ROVNER  
ZIMMERMAN, SIGMAN AND SCHMIDT**

DATED: November 9, 2023 BY: /s/*Jeffrey D. Schmidt*  
JEFFREY D. SCHMIDT, ESQUIRE  
Attorney for Plaintiff